

POMERANTZ LLP**VIA FAX**

August 7, 2020

The Honorable Colleen McMahon
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street – Room 2550
New York, New York 10007

Ok, extension
granted.

MEMO ENDORSED

Re: *In re Allergan PLC Securities Litigation*, No. 18 Civ. 12089 (CM) (GWG)

Dear Chief Judge McMahon,

8/10/2020

My Firm is Lead Counsel in the above-referenced action. We write with the consent of Defendants in regard to Plaintiff's August 4 letter-motion seeking a slight extension to certain deadlines in the current Case Management Plan. *See* ECF No. 138. Together with counsel for Defendants, we attempted to call the Court to notify Chambers that this submission is time sensitive and requires more immediate attention. We are following up with this letter, in accordance with the Court's recorded message that we reached when we attempted to call the Court.

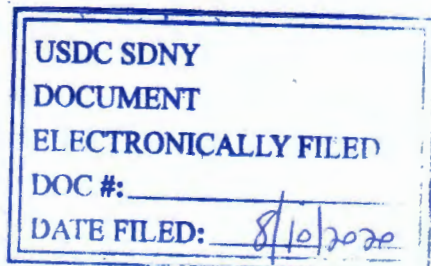
Because of the time sensitivity of the request, we would appreciate it if the Court would consider the request today. The Parties are still expeditiously working together to complete fact discovery, due to unforeseen challenges created by the COVID-19 pandemic. However, deadlines implicated by the original case schedule begin to run today. Under the current schedule, today is the last day for the Parties to file discovery-related motions before Magistrate Judge Gorenstein (*see* ECF No. 99, ¶3), as well as to serve certain follow-on discovery requests. Additionally, there are other impending deadlines under the current schedule implicated by the proposed extension, including the August 12, 2020 deadline for the parties to identify experts (*see* ECF No. 128, at 3). The slight extensions we seek may obviate certain near-term motion practice and will allow for an orderly close to discovery.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Murielle J. Steven Walsh

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CC: Counsel of Record (via email)